

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Case No. 12-md-2323 (AB)

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and others
similarly situated,*

Hon. Anita B. Brody

Plaintiffs,

National Football League and
NFL Properties LLC,
successor-in-interest to NFL Properties,
Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

PETITION TO ESTABLISH ATTORNEY'S LIEN

COMES NOW Petitioners – Patrick J. Tighe, Esquire/X1LAW, PA – Individually Retained Plaintiff's Attorney ("IRPA"), and, pursuant to an executed Agreement for Legal Services come now and state as follows:

1. Petitioners are attorneys at law admitted to practice before the courts of Florida, and file this Petition to establish a lien for attorney's fees as set forth hereinafter.
2. On or about June 15, 2017, Petitioners, X1LAW, PA, were retained and employed by the Plaintiff, Garrett Wolfe, pursuant to an agreement for legal services, to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football-related concussions, head and brain

injuries.

3. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained, client will not owe a legal fee. If Attorney Patrick J. Tighe/X1 LAW PA, obtains a settlement or judgment for the client, client will pay to the attorney thirty-three and one third percent (33 1/3%) of the gross recovery plus reimbursement of expenses. Attorney Patrick Tighe's fee has been lowered to 22% due to the Court Order dated April 5, 2018, adopting a cap of attorney's fees to 22%.
4. From the date the Petitioner was authorized to proceed on behalf of the retired player, Garrett Wolfe (Plaintiff), the Petitioner has actively and diligently investigated, prepared and pursued Plaintiff's claims, and has taken all steps necessary to prosecute those claims, including, but not limited to, correspondence and communication with the client, preparation and review of client's factual and legal circumstances, retaining experts, drafting and providing client updates, analyzing Plaintiff's medical status and need for medical testing, and scheduling and paying for an exam by a neurologist. Petitioner has incurred over \$7,000.00 in expenses directly related to Plaintiff's claim.
5. The Plaintiff discharged the Petitioners as his attorney in this matter, and has hired another attorney in this action.
6. Petitioners were not terminated due to any malfeasance or other improper action.
7. The Petitioners claim the right to have a lien for attorney's fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioners pray:

1. That an attorney's lien for fees and expenses be established;
2. That the amount of lien be determined;
3. That the Court order that Petitioner be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Claims Administrator or the NFL be prohibited from paying to the Plaintiff any sums of money until said lien has been satisfied; and,
5. For such other relief as this Court deems just.

Dated: April 26, 2021

Respectfully Submitted,

Attorneys for Plaintiffs/Movants
Patrick J. Tighe
X1LAW, P.A. f/k/a Patrick J. Tighe, P.A.
721 US Highway 1, Ste 101
North Palm Beach, FL 33408
Phone: (561)537-3319
Fax: (561)537-7193
Pat@X1LAW.com
Florida Bar No. 568155

s/Patrick J. Tighe
Patrick J. Tighe

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2021, the foregoing document was electronically filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, and that the filing is available for downloading and viewing from the electronic court filing system by counsel for all parties.

X1LAW, P.A.

s/Patrick J. Tighe

Patrick J. Tighe